James W. Ehrman KOHRMAN JACKSON & KRANTZ PLL One Cleveland Center, 20th Floor 1375 East 9th Street Cleveland, Ohio 44114-1793 Telephone: (216) 696-8700 Facsimile: (216) 621-6536

Attorneys for Sunnyside Automotive XVII, LLC,

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

|                               | ) |                        |
|-------------------------------|---|------------------------|
| In re:                        | ) | Chapter 11 Case No.    |
|                               | ) | -                      |
| GENERAL MOTORS CORP., et al., | ) | 09-50026 (REG)         |
|                               | ) |                        |
| Debtors.                      | ) | (Jointly Administered) |
|                               | ) | ,                      |

## **NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE that Sunnyside Automotive XVII, LLC hereby enters its appearance in the above-captioned bankruptcy case by and through its counsel, Kohrman Jackson & Krantz PLL, and requests pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and sections 102(1) and 1109(b) of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the "Bankruptcy Code"), that all notices given or required to be given in connection with this case and all papers served or required to be served in this case or in any proceeding arising in or related to this case, be given to and served upon:

James W. Ehrman, Esq. KOHRMAN JACKSON & KRANTZ, PLL One Cleveland Center, 20th Floor 1375 East Ninth Street Cleveland, Ohio 44114-1793 Telephone: (216) 696-8700

Facsimile: (216) 621-6536 Email: jwe@kjk.com PLEASE TAKE FURTHER NOTICE that this request includes not only the orders, notices, pleadings, and other papers referred to in the Bankruptcy Rules but also, without limitation, all orders and notices of any application, motion, petition, objection, request, complaint or demand, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, courier, hand delivery, facsimile transmission, electronic mail, telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interests of or in (a) the Debtors, (b) property of the Debtors, (c) property of the Debtors' estates, (d) proceeds of any of the foregoing or (e) property in the possession or control of the Debtors or (2) requires or seeks to require any delivery of property, payment or any other act or conduct by Sunnyside Automotive XVII, LLC.

This request under Bankruptcy Rule 2002 is not and may not be deemed or construed to be a waiver of any of Sunnyside Automotive XVII, LLC's substantive or procedural rights, including without limitation (a) any right to require that where any adversary proceeding is initiated against Sunnyside Automotive XVII, LLC in this or any related case or where any proceeding is initiated by complaint against Sunnyside Automotive XVII, LLC under applicable non-bankruptcy law, service be made on Sunnyside Automotive XVII, LLC in accordance with the applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon the undersigned counsel is insufficient for such purposes; (b) any right to have any final order in a non-core matter entered only after *de novo* review by the United States District Court; (c) any right to trial by jury in any proceeding so triable in this case or in any case, controversy or proceeding related to this case; (d) any right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (e) any other right, claim, action, defense, setoff or recoupment to

which Sunnyside Automotive XVII, LLC is or may be entitled under any agreement, in law or in equity, all of which rights, claims, actions, defenses, setoffs or recoupments Sunnyside Automotive XVII, LLC expressly reserves.

Dated: June 23, 2009 Respectfully submitted,

/s/ James W. Ehrman

James W. Ehrman (Ohio ID #0011006) KOHRMAN JACKSON & KRANTZ PLL One Cleveland Center, 20th Floor 1375 East Ninth Street Cleveland, Ohio 44114-1793 Telephone: (216) 696-8700

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 $Counsel\ for\ Sunnyside\ Automotive\ XVII,$ 

LLC,

## CERTIFICATE OF SERVICE

I, James W. Ehrman, an attorney, certify that the foregoing was filed electronically and that service was accomplished electronically to all ECF registrants via the Court's CM/ECF System on June 23, 2009.

/s/ James W. Ehrman
James W. Ehrman (Ohio ID #0011006)